



## **FINANCIAL CONFLICT OF INTEREST DISCLOSURE POLICY**

Area:	Research Integrity	Number:	RI_401
Applies to:	All Faculty and Staff	Issued:	02/24/2013
Sources:		Revised:	06/28/2018
		Reviewed:	
Policy Owner:	Provost & Vice-President for Academic Affairs	Page(s):	3

### **I. Purpose**

The policy aims to promote objectivity in research by increasing transparency and accountability in the progressively more complex relationships among researchers, research institutions, research sponsors, and the private sector.

### **II. Policy Statement**

As an integral part of its institutional mission, Georgia Southern University upholds the principles of free and unbiased inquiry, transfer of ideas and technologies for public benefit, and stewardship of the resources entrusted to it. As faculty and employees increasingly build complex relationships with private companies, financial and other internal and external relationships must not conflict nor appear to conflict with these principles.

Prior to submitting a sponsored proposal, all investigators must disclose to the university any significant financial interests that they or any member of their immediate family have in any commercial enterprise or with members of the research team that will in any way influence the proposed sponsored program or be affected by its performance or completion. The Office of Research Integrity or designee will review submitted disclosures to determine financial conflicts of interest, real or potential, and, in collaboration with the Conflict of Interest Subcommittee of the Intellectual Property Committee or Research Associates Deans Council (or equivalent) and the investigator, design a plan to manage, reduce, or eliminate them.

The University will not generally allow an investigator holding a financial conflict of interest to conduct human studies designed to answer questions about the effects or impact of particular drugs, medical devices, treatments, or diagnostic procedures -- unless there are compelling circumstances for the investigator's participation in the research. This prohibition applies not only to the principal investigator, but to anyone who is responsible for the design, conduct, or reporting of the research.

*"With the welfare of research subjects always of foremost concern, an institution should regard all significant financial interests in human subjects research as potentially problematic and, therefore, as*

*requiring close scrutiny. Institutional policies should establish the rebuttable presumption that an individual who holds a significant financial interest in research involving human subjects may not conduct such research."* Association of American Medical Colleges (AAMC) and the Association of American Universities (AAU), Protecting Patients, Preserving Integrity, Advancing Health: Accelerating the Implementation of COI Policies in Human Subjects Research, February 2008.

### **III. Exclusions**

The following conditions are not generally considered evidence of a Financial Conflict Of Interest (FCOI):

1. salary, royalties, or other remuneration from GS;
2. ownership interests in an entity funded through the Small Business Innovation Research (SBIR) or Small Business Technology Transfer (STTR) programs;
3. income from seminars, lectures, or teaching engagements sponsored by public, nonprofit, or not-for-profit entities;
4. income from service on advisory committees or review panels for public entities or nonprofit or not-for-profit entities NOT affiliated with for-profit companies;
5. an equity interest that, when aggregated for the investigator and the investigator's spouse and dependent children, does not exceed \$5,000 in value as determined by public prices or other reasonable measures of fair market value and does not represent more than \$5,000 in family members' aggregate ownership interest in any single, publicly traded entity (Note: no exclusion for interest in a non-publicly traded company);
6. salary, royalties, or other payments (excluding dividends) from a single corporate entity that, when aggregated for the investigator and the investigator's spouse and dependent children over the past 12 months, does not exceed \$5,000 (NIH FAQ D8); and
7. Travel reimbursement from a single sponsor if the total reimbursement does not exceed \$5000 in the previous 12 months. (NIH FAQ E. 9; 1/2014)

### **IV. Procedures**

The Office of Research Integrity facilitates financial conflict of interest (a) training once every four years and (b) disclosure, required annually and prior to proposal submission. See <http://research.georgiasouthern.edu/researchintegrity/financial-conflict-of-interest/>.

#### **Related Information:**

The following links aim to accurately describe and promote compliance with the financial conflict of interest policies related to sponsored activity of the University System of Georgia and Georgia Southern University.

National Institutes of Health

- <http://grants.nih.gov/grants/policy/coi/>

National Science Foundation

- [NSF "Investigator Financial Disclosure Policy"](#)

- [NSF "Frequently Asked Questions Concerning the DHHS Objectivity in Research Regulations and the NSF Investigator Financial Disclosure Policy"](#)
- [NSF Proposal and Award Policies and Procedures Guide, January 2011, Part II - Award & Administration Guide, Chapter IV, A. Conflict of Interest Policies](#)
- [NSF Proposal and Award Policies and Procedures Guide, January 2011, Part I - Grant Proposal Guide, Chapter II, C.1.e. Proposal Certifications](#)

U.S. Department of Education

- [34 CFR Part 74, Subpart C § 74.42, Codes of Conduct](#)
- [34 CFR Part 75, Subpart E § 75.525, Conflict of interest: Participation in a project](#)

U.S. Food and Drug Administration

- [21 CFR Chapter 1, Subchapter A, Part 54, Financial Disclosure by Clinical Investigators](#)

U.S. Department of Health and Human Services (including Public Health Service and National Institutes of Health)

- [42 CFR Part 50, Subpart F, Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought.](#)
- [45 CFR Part 94, Responsible Prospective Contractors](#)